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UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

C.A. # 3:11-cv-30271-MAP

ALBERTO L. GONZALEZ, Plaintiff,)
V.)
)
TIMOTHY V. DOOLING, JULIE PEASE, JEFFREY STONE, JOHN TALBOT,)
GARY LUCERO, STACY BOOK MICHELLE GOLDMAN, HEATHER HALL)
and INA HOWARD-HOGAN,)
Defendants.)

DEFENDANT HEATHER E. HALL'S MOTION TO COMPEL THE PRODUCTION OF DOCUMENTS FROM THE COMMISSIONER OF PROBATION OF THE COMMONWEALTH, A NON-PARTY

Pursuant to Fed. R. Civ. P. 37, Heather E. Hall, a defendant in the above captioned matter, hereby moves for an Order of this court compelling the Commissioner of Probation of the Commonwealth to comply with a subpoena duces tecum issued in connection with the above captioned matter.

In support the documents sought through the subpoena duces tecum fall within the scope of Fed. R. Civ. P. 26 in that they are relevant and relate to the plaintiff's claim and the defenses as raised by the defendant. Furthermore, the information sought is relevant to the subject matter involved in the action and Ms. Hall's request is supported by good cause.

Ms. Hall further relies upon the memorandum of law filed in support of her motion.

WHEREFORE, the defendant, Heather E. Hall, respectfully requests this honorable court to issue an order compelling the Commissioner of Probation to comply with the subpoena duces tecum at issue.